UNITED STATES BANKRUPTCY COUL SOUTHERN DISTRICT OF NEW YORK		
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	:	
In re	:	Chapter 11 Case No.
	:	
GENERAL MOTORS CORP., et al.,	:	09-50026 (REG)
	:	
Debtors.	:	(Jointly Administered)
	:	
	X	

# NOTICE OF CREDITOR'S CONTRACT OBJECTION SOLELY AS TO CURE AMOUNT

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

### Objection to Omission of Certain Cure Amounts

Healthtrax International, Inc. ("Healthtrax") and certain of its subsidiaries, as suppliers to the debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "Debtors") respectfully objects to the Debtor's proposed amount to cure all prepetition defaults to Healthtrax as of the Commencement Date in accordance with section 365 (b) of the Bankruptcy Code (the "Cure Amounts").

Healthtrax respectfully submits the Exhibit A attached hereto, which Exhibit A sets forth those prepetition defaults that were omitted from the "Notice of (I) Debtors' Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Personal Property, and Unexpired Leases of Nonresidential Property and (II) Cure Amounts Related Thereto."

#### Notice

Copies of this Objection have been sent to (i) the Debtors, c/o General Motors Corporation, Cadillac Building, 3009 Van Dyke Avenue, Warren, MI 48090-9025 (Attn: Warren Command Center, Mailcode 480-206-114); (ii) Weil, Gotchal & Manges LLP, attorneys for the Debtors, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq. Stephen

Karotkin, Esq., and Joseph H. Smolinsky, Esq.); (iii) the U.S. Treasury, 1500 Pennsylvania

Avenue NW, Room 2312, Washington, D.C. 20220 (Attn: Matthew Feldman, Esq.); (iv)

Cadwalader, Wickersham & Taft LLP, attorneys for the Purchaser, One World Financial Center,

New York, New York 10281 (Attn: John J. Rapisardi, Esq.); (v) Kramer, Levin, Naftalis &

Frankel, attorneys for the Creditors Committee, 1177 Avenue of the Americas, New York, New

York 10036; (vi) Vedder Price, P.C., attorneys for Export Development Canada, 1633

Broadway, 47th Floor, New York, New York 10019 (Attn: Michael J. Edelman, Esq. And

Michael L. Schein, Esq.); and (viii) the Office of the United States Trustee for the Southern

District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Diana

G. Adams, Esq.).

WHEREFORE, Healthtrax International, Inc. respectfully requests the resolution and

payment of the Cure Amounts omitted from Debtors' Notice, as set forth on Exhibit A attached

hereto and made a part hereof.

Dated: June 12, 2009

HEALTHTRAX INTERNATIONAL, INC.

2345 Main Street

Glastonbury, CT 06033

Telephone: (860) 633-5572 x 256

Facsimile: (860) 633-7472

General Counsel

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#### **Exihibit A**

A/R missing from General Motors Cure Amount listed on website www.contractnotices.com for Healthtrax International Inc and/or Work-Fit®

## **Ultimate DUNS - RD 131000390**

GM Location	<u>Utlimate Duns #</u>	PO Number	BOL.	Document date	<u>Amount</u>	
Defiance	RD131000390	PDR96202	DEF0409	4/30/2009	\$16,662.00	
	RD131000390	PDR96203	DEF0509	5/29/2009	\$16,662.00	
						\$33,324.00
Flint Engine South	RD131000390	PVR01287	GMFES0309	3/31/2009	\$6,956.00	
	RD131000390	PVR01290	GMFES0409	4/30/2009	\$6,956.00	
	RD131000390	PVR01291	GMFES0509	5/29/2009	\$6,956.00	
						\$20,868.00
Romulus	RD131000390	RMR21842	GMROM0509	5/29/2009	\$9,814.00	
			9			\$9,814.00
Warren Tech	RD131000390	not received	GMWAR1208	12/1/2008	\$6,800.00	
Blanket PO #	RD131000390	not received	GMWAR0109	1/31/2009	\$6,800.00	
GMB07445	RD131000390	not received	GMWAR0209	2/28/2009	\$6,800.00	
	RD131000390	not received	GMWAR0309	3/31/2009	\$6,800.00	
	RD131000390	not received	GMWAR0409	4/30/2009	\$6,800.00	
	RD131000390	not received	GMWAR0509	5/29/2009	\$6,800.00	
						\$40,800.00
Total contract omissions from the Cure Amount						